

NICHOLAS A. TRUTANICH
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration
MICHAEL K. MARRIOTT, CSBN 280890
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 977-8985
Facsimile: (415) 744-0134
E-Mail: Michael.Marriott@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
LAS VEGAS DIVISION**

DYANNE L. SCHWALM,)	Case No: 2:18-cv-01587-APG-PAL
)	
Plaintiff)	
)	
v.)	STIPULATION FOR EXTENSION OF
)	TIME TO FILE DEFENDANT'S CROSS
)	MOTION TO AFFIRM
NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security,)	(First Request)
)	
Defendant.)	
)	

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests an extension of time of thirty days to Friday, May 17, 2019, to prepare and file her cross motion to affirm. This is the Commissioner's first request for an extension.

Defendant respectfully requests this extension of time because of a very heavy workload, including over twelve district court merits briefs due in the next four weeks, as well as a Ninth Circuit responsive brief to complete.

1 On April 17, 2019, Plaintiff's counsel informed Defendant by email that he had no
2 objection to this extension.

3
4 Respectfully submitted,

5 Date: April 17, 2019

LAW OFFICES OF LAWRENCE D. ROHLFING

6 By: /s/*Cyrus Safa

7 CYRUS SAFA

8 *authorized by email April 17, 2019

9 Attorney for Plaintiff

10 Date: April 1, 2019

NICHOLAS A. TRUTANICH

11 United States Attorney

12 By: /s/ Michael K. Marriott

13 MICHAEL K. MARRIOTT

14 Assistant Regional Counsel

15 Attorneys for Defendant

16 Of Counsel

Jeffrey Chen

17 Assistant Regional Counsel

18 Social Security Administration

19
20 IT IS SO ORDERED.

21
22 DATE: April 23, 2019



23 HONORABLE PEGGY A. LEEN

24 United States Magistrate Judge

CERTIFICATE OF SERVICE

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Cyrus Safa
Law Offices of Lawrence D. Rohlfsing
12631 E. Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670

Date: April 17, 2019

NICHOLAS A. TRUTANICH
United States Attorney

By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
Assistant Regional Counsel

Attorneys for Defendant